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March 28, 2023

Via ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Palmore v. Napoli Shkolnik PLLC et al.*
Civil Action No. 1:23-cv-01616-ER

Dear Judge Ramos:

This firm represents the defendants in the above-referenced action (the “Defendants”). The Defendants respectfully submit this letter motion to request an extension of time to move, plead, or otherwise respond to the Complaint to May 11, 2023.

The current deadline for the individual Defendants to move, plead, or otherwise respond to the Complaint is April 4, 2023, and the current deadline for the law firm Defendant to respond to the Complaint is April 5, 2023. Each of the Defendants is seeking an extension of the deadline to respond to the Complaint to May 11, 2023. This is the Defendants’ first request for an extension of time to respond to the Complaint. The Plaintiff consents to the requested extension.

The requested extension is necessary to provide the Defendants with sufficient time to investigate the factual allegations contained in the Plaintiff’s 59-page Complaint and to prepare the proper responsive filing.

Accordingly, the Defendants respectfully request that the Court extend their time to move, plead, or otherwise respond to the Complaint to May 11, 2023, as consented to by the Plaintiff.

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March 28, 2023
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Respectfully submitted,

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cc: **Via ECF**

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